

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

FILED

JUN 05 2024

Heidi D. Campbell, Clerk  
U.S. DISTRICT COURT

1 PAULETTE TAYLOR, INDIVIDUAL, MOTHER  
and NEXT FRIEND of G.G, III, A MINOR

Jury Trial Demanded

Plaintiff,

24 CV - 266 GKF - JFJ

V.

CIVIL CASE NO. \_\_\_\_\_

COMPLIANT

[1] INDEPENDENT SCHOOL DISTRICT NO.1  
OF TULSA COUNTY, OKLAHOMA aka  
TULSA PUBLIC SCHOOL aka "TPS"

[2] DR. MELISSA WOOLRIDGE, principal, Washington HS aka "BTW"  
in her official, individual and personal capacity

[3] Chennai Arterberry, Washington HS, aka "BTW" Dean of Students  
in her official, individual and personal capacity

[4] EVA VINDAS, TITLE IX COORDINATOR  
in her official, individual and personal capacity

[5] STEPHANIE ANDREWS, Executive Director of STUDENT and FAMILY Support  
in her official, individual and personal capacity

[6] DR. OLIVER WALLACE, Director of STUDENT and FAMILY ADVOCACY  
in his official, individual and personal capacity

[7] Michelle Sigfield, District Lead of School & Workplace INVESTIGATIONS  
In her official, individual and personal capacity

[8] JANA BURK, TULSA PUBLIC SCHOOL, GENERAL COUNSEL  
in her official, individual, and personal capacity

Defendants.

## COMPLAINT

1. COMES NOW the Plaintiff, Paulette Taylor, INDIVIDUALLY, as MOTHER and NEXT FRIEND of G.G.III, a MINOR ( hereinafter referred to as "Plaintiffs") brings this Complaint against Defendant, Tulsa Public School, Dr. Melissa Woolridge, Principal, and Chennai Arterberry, Dean of Students of Washington HS aka "BTW", Eva Vindas, TITLE IX Coordinator, Stephanie Andrews, Executive Director of Student and Family Support, Michelle Sigfield, District Lead of School & Workplace Investigations, Dr. Oliver Wallace, Director of Student and Family Advocacy and Jana Burk, General Counsel (hereinafter referred to as "Defendants" ), and allege as follows:

### A. PARTIES

2. Plaintiff, Paulette Taylor Obo G.G., III, a Minor, resides in Tulsa County, State of Oklahoma.
3. Defendant, Independent School District No. 1 of Tulsa County, Oklahoma commonly known as Tulsa Public Schools ("the School District") ("TPS") a public body corporate.
4. Dr. Melissa Woolrige, an active Principal of Washington HS aka "BTW", is on information and belief a resident of Tulsa, Tulsa County, Oklahoma.
5. Chennai Arterberry, an active Dean of students, Washington HS, aka "BTW", is on Information and belief a resident of Tulsa, Tulsa County, Oklahoma
6. Eva Vindas, Title IX Coordinator, an active employee, is on information and belief a resident of Tulsa County, Oklahoma.
7. Stephanie Andrews, an active Executive director of student and family support,

is on information and belief a resident of Tulsa County, Oklahoma.

8. Dr. Oliver Wallace, an active Director of student and family advocacy, is on information and belief a resident of Tulsa, Tulsa County, Oklahoma.

9. Michelle Sigfield, an active District Lead of School & Workplace Investigations and a newly, acting Title IX and Human Rights Coordinator, is on information and belief a resident of Tulsa, Tulsa County, Oklahoma; and

10. Jana Burk, an active Education Law Attorney, TPS General Counsel, is on information and belief a resident of Tulsa, Tulsa County, Oklahoma

## **B. JURISDICTION AND VENUE**

11. This Northern District Court of Oklahoma has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343(a) (3) and (4), as this action arises under the laws of the United States.

12. All actions were committed by the parties located in Tulsa County, State of Oklahoma Pursuant to 28 U.S.C. § 116(a), Tulsa County is within federal judicial served by the United States District Court of Northern District of Oklahoma.

13. This Court has subject matter jurisdiction over the claims asserted by Plaintiff and personal jurisdiction over the parties to this action and “venue” is proper.

14. **28 U.S.C. § 1367** grants federal district courts the authority to hear both federal and state law claims in the same lawsuit.

15. Title IX is a federal law, and the violations of Title IX can be filed in this Federal Court due to claims involved are Federal rights violations.

16. Independent School District No. 1 of Tulsa County, Oklahoma (Tulsa Public School) is a public body corporate and is the only entity with a legal existence capable of suing and being sued. OKLA. STAT. tit. 70, §§5-105 and 5-106.
17. TPS receives federal funding, therefore is subject to Title IX compliance rules.
18. This Court has the authority to enter a declaratory judgment and to provide injunctive relief pursuant to Federal Rules of Civil Procedure 57 and 65, and 28 U.S.C. §§ 2201 and 2202.
19. This civil action was filed within the statutory time limits under the Oklahoma Governmental Tort Claims Act.<sup>51</sup> O.S. § 156. NO RESPONSE was received.

### **C. NATURE OF CASE**

20. This is a civil rights action seeking legal clarification, injunctive relief, and damages for the Defendant's violation of false, fictitious, and fraudulent claims of the Plaintiff violating district Policy 318: Title IX Sexual Harassment as known as Title IX of the Education Amendments of 1972, ("Title IX"), 20 U.S.C. §§ 1681et seq., to Plaintiff's report to the Tulsa Police fearful for his health and safety due to Tulsa Public School, Washington HS abject failure to adhere to compliance standards consistent with District Policy 2119 "Student Bullying Prevention and Intervention," and Policy 3316-R Athletics despite multiple complaints. As a result, Defendant took adverse action against Plaintiff, on an emergency basis, abruptly suspended Plaintiff for 150 days (a year) as a purported threat, infringed Plaintiff's due process rights, aka "BTW's" abject failure and inconsistency in adhering to school policies, federal,

state and local laws. In doing so, Defendant 2, Dr. Woolridge, principal, consciously violated the Plaintiff's "Due Process" rights outlined in the Title IX Grievance Procedures pursuant to Title IX Regulations adopted by the U.S Department of Education(USDOE), effective August 14, 2020. In addition to violating his First, Fifth Sixth and Fourteenth Amendments of the U.S.Constitution (see 42 U.S.C. §1983) and title 2 §7 of the Oklahoma Constitution. As a result of the Defendants unreasonable behavior and deliberate malicious prosecution the minor, Plaintiff Transcript has been tarnished, continues to suffer being denied of his right to attend school pursuant Oklahoma Education Act,70 O.S.§ 10-105 and prohibited from exercising his right under State Transfer Law, SB 783 effective January 1, 2022. In addition to HB 1934. Once again, Defendant took additional adverse actions after Plaintiff made multiple complaints throughout the district and beyond seeking just and fair treatment. Again,to silence Plaintiff, Defendant made an additional fraudulent claim stating that Plaintiff violated District Policy 315:Title IX Discriminatory Harassment, yet again, violating Plaintiff's due process along with holding Plaintiff hostage in the TPS school district, forcing him to attend Traice's Academy Alternative school against his will, and banning his return to Washington HS. In the same way, The Defendant is preventing the Plaintiff from enrolling in a different school district and deliberately, depriving the Plaintiff of his right to a quality education and equal opportunity in a learning environment that best fits his needs to aspire, achieve, participate in, maximize ability, thereby, improving and increasing his outcomes to

indubitably contribute to society. This action also seeks damages for unlawful retaliation, defamation, wrongful suspension, negligence per se, due process violations, and breaches of constitutional rights.

**21. Cause of Action: Negligence: §21-93 and §25-6 and §23-13**

***Oklahoma Statutes § 70-24-100.4 School Safety and Bullying Prevention Act***

***I allege the following:***

1. The Plaintiff, a student of Tulsa Public School, Washington HS aka "BTW" during the 22-23 school year. "But for" the failure of Head Football Coach Brown to exercise due care, by acting contrary to TPS district Policy 3316-R: "Athletics" and Policy 2119: "Student Bullying Prevention and Intervention". ( per se unreasonable) The Plaintiff would not have suffered grievous misconduct in the form of "emotional, social, physical and sexual bullying" by a select group of football players continually beginning on and around June 8, 2022 through August 30, 2022 at "BTW" Field house. His failure to act in accordance to district policies in the face of multiple complaints created a very uncomfortable and unsafe learning environment. But for his breach of duty of care, acting contrary to district policies ( per se unreasonable) The Plaintiff would not have suffered a physical assault and sustained a bloody bodily injury on August 30, 2022. by the hands of a fellow student athlete T. Bethel on the grounds of Washington HS. This injury could have been prevented if the head coach Brown acted in compliance with district policies and safety protocols being that the minor Plaintiff was meant to be protected by the district established

Policies. On August 30, 2022 around 3:45pm the Plaintiffs reported the bodily injury to Head Coach Brown, yet again he refused to be govern by district Policy 2119 & 3316-R. August 31, 2022 Plaintiffs, again reported a physical assault, with a bodily injury sustained on "BTW's" campus to the head coach. Undeterred, head coach still chose to act contrary to district Policy 2119 and 3316-R.

**22. Cause of Action: Negligence §21-93 and §25-6 and §23-13**  
**Oklahoma Statutes § 70-24-100.4 School Safety and Bullying Prevention Act**  
***I allege the following:***

1. On September 1, 2022, Plaintiff contacted Defendant 6, Dr. Wallace regarding the ongoing unaddressed bullying and physical assault. Defendant 6, Dr. Wallace, an indifferent lead school official, failed to exercise due care as well, by not reviewing and resolving parent concerns with Defendant 2, Dr. Woolridge, principal but rather asking, "what do you want me to do?" thereby, doing nothing, causing the minor, Plaintiff to be left at risk, defenseless and subject to more harm of victimization, and in distress, seeking protection for himself due to Defendant 6, Dr. Wallace dereliction of duty, acting contrary to district policies (per se unreasonable) intentionally failing to advocate for the victim.

**23. Cause of Action: Negligence §21-93 and §25-6 and §23-13**  
**Oklahoma Statutes § 70-24-100.4 School Safety and Bullying Prevention Act**

***I allege the following:***

1. In utter shock to Defendant 6, Dr. Wallace's response, Plaintiff

turned to assistant Deana Hendrix, with empathy, instructed Plaintiff to call TIPSline for immediate assistance. Plaintiff made reports of bullying, physical assault, personal injury etc.. adding Defendant 6, Dr. Wallace's lack of empathy and failure to address the social, emotional, health, and safety needs of Plaintiff when phoned to the TIPSline. In addition to emailing Defendant 2, Dr. Woolridge, principal regarding the physical assault and personal injury sustained on "BTW" grounds August 30, 2022. as a result of the head coach's failure to exercise reasonable care to prevent and protect the Plaintiff from continued harm. After Plaintiff contacted TIPSline and Defendant 2, Dr. Woolridge received email she elected Defendant 3, Dean Arterberry, on Thursday @ 9:43am on September 1, 2022 to immediately complete a bullying investigation. On September 2, 2022, mid-morning, Defendant 3, Dean Arterberry phoned and left a voicemail on the Plaintiff's phone stating investigation complete her and all allegations was found to be true and accurate. However, not stating what steps will be taken to prevent the bullying in the future, offered no counseling for Plaintiff at the school as deemed necessary. "But for" Defendant 3, Dean Arterberry's 's failure to exercise reasonable care during her investigation the Plaintiff would not have continued to be harassed by about seven football players ganging up on him in the cafeteria during "C" lunch around 12:25-12:50p on September 2, 2022 asking him why did he rat on Them. The continued harassment is direct result Defendant 3, Dean Arterberry acting contrary to district policies (Per se unreasonable) during her bullying

Investigation, she failed to demonstrate her Bullying Awareness/ Intervention required training skills along with sensitivity to the Interpersonal Dynamics of bullying behavior caused the minor, Plaintiff to be unprotected from reprisal, retaliation and false accusations. "But for" Defendant 3, Dean Arterberry's lack of reasonable care, lack of candor, trained or untrained, she created a very hostile, unwelcoming, and unsafe learning environment due to her reckless disregard to keep and protect the Plaintiff's identity and complaint confidential thus causing the Plaintiff to instantly suffer the repercussions of exercising his protected right (speech) right to report acts of bullying in confidence. As a result, Defendant 3, Dean Arterberry's egregious failure to act in compliance to district policies caused Plaintiff to not only suffer being mocked, but experience more verbal harassment, being endlessly called a snitch, a bit.. and a trader, along with threats of serious premeditated bodily harm as a result of Defendant 3, Dean Arterberry's reckless disregard for the Plaintiff's health and safety. Clearly, the Plaintiff would not have been made to feel rejected, unwelcomed, and excluded as a target to repay for exercising his protected rights to report patterns of harassment assumed in confidence and the school dereliction of duty to properly and promptly intervene. "But for" Defendant 3, Dean Arterberry's failure to act in compliance with district bullying investigations and training. Along with Coach Brown's blatant failure to act in compliance with the established district Policy 3116-R: Athletics, 2119 and 2119-R Bullying and Prevention and Intervention policy and procedures. Plaintiff would not have felt very vulnerable, fearing for his health and safety and in desperation, feel the need to call 911 (Tulsa Police) seeking

protection from acts of bullying harassment and threats of bodily harm on September 2, 2022. due to BTW's reckless disregard to take quick action to stop and provide protection from the ongoing bullying harassment while preventing additional physical assaults.

**24. Cause of Action: Negligence §21-93 and §25-6 and §23-13**

***I allege the following:***

1. After the Plaintiff notified the police on Septemeber 2, 2022 around 3:15pm about impending threats of violence made by a select group of athletes at the "BTW" field house around 3:20pm. Tulsa Police notified the campus police JW and some school officials immediately intervened. Plaintiff found in the coach's meeting room in the field house, prohibited from entering the locker room as per. head coach directive due to the threats of bodily harm made by three athletes. Despite the coach witnessing the threats of violence he still chose not to comply with district Policy 3316-R nor Policy 2119. On September 2,2022 at about 4:15p the Tulsa Police Department aka "TPD" concerned for Plaintiff health and safety, followed up with a wellness check with a caring visit from a TPD Officer around 4:35p making certain Plaintiff was safe and sound and out of harm's way. Despite the fact, he couldn't intervene any further as desired due to jurisdiction. Howbeit, he promised to forward concerns to the North Tulsa School Resource Officer, D. Alexander ensuring he'd phone the Plaintiff to further assist. During the time of the Tulsa Police wellnes check on September 2, 2022 around 5:00pm the Plaintiff received a phone call from Defendant 3, Dean Arterberry reaffirming her investigation was completed and the assault allegations were found to be true and correct. However, due to safety concerns she wanted to schedule a Safety Plan

Meeting via Zoom on Tuesday, September 6, 2022 @10am.

On September 6, 2022 @10am the Plaintiffs met with Defendant 2, Dr. Woolridge, principal, Defendant 3, Dean Arterberry alongwith a couple of lead school officials. During meeting, the mother, Plaintiff very concerned, shared complaints of how the minor, Plaintiff had been experiencing increase threats of violence due to Defendant 3, Dean Arterberry's atrocious investigative actions which put the minor, Plaintiff in harms way, students were ganging up on him the cafeteria, threatening physical violence, kids telling him to take his clothes off because he wasn't a Hornet but a snitch, a bit..and a trader, alongwith athlete, TG going around touching the minor, Plaintiff along with other male students in their private area. During this September 6, 2022 ZoomMeeting; Defendant 2, Dr. Woolridge and Defendant 3, Dean Arterberry despite being required under the law, and district Policy 2219 encourages students to report and require staff members to submit acts of bullying reports to Defendant 2, Dr. Woolridge, the principal and/or her designee. The Plaintiffs mystified by Defendants 2, Dr. Woolridge and Defendant 3, Dean Arterberry's reactions to their complaints, together, they were in absolute denial and full cover-up mode once the bullying reports were received. Thereby, trying to make the Plaintiffs feel awfully bad about reporting, by that, began to use gaslighting tactics to sway the Plaintiff to forget about the allegations of verbal, physical and sexual bullying by TG acting as if the Plaintiff was delusional and clueless to their own experiences. Nonetheless, the Plaintiff consistently restated the allegations setforth within this no. 24 cause of action above, and are incorporated by reference as if setforth at length herein. AND finally, with much frustration, Defendant 2, Dr. Woolridge realize her gaslighting efforts to deceive and manipulate were ineffective therefore, chose to email a report form to the Plaintiff to complete and return. The

minor, Plaintiff returned to school around 8:20am on September 7, 2022 with the Safety Plan in place. As a consequence, due to fear of punishment, athletes were directed not to talk to Plaintiff by Defendant 3, Dean Arterberry. Thereby, isolating Plaintiff by issuing a “no-contact order” to his friends while on the otherhand, unprotected from reprisal, retaliation and false accusations from Defendant 2, Dr. Woolridge, Defendant 3, Dean Arterberry, two choice athletes, 7 skillful bullies and Resource Officer Derrick Alexander.

**25. Cause of Action: Defamation, Civil conspiracy and Improper Suspension**

- a. “Due Process” rights violated outlined in the Title IX Grievance Procedures pursuant to Title IX Regulations adopted by the U.S Department of Education(USDOE), effective August 14, 2020.
- b. *First, Fifth, Sixth and Fourteenth Amendments of the U.S.Constitution (see 42 U.S.C. §1983) violated.*
- c. Title VI of the Civil Rights Act of 1964 violated
- d. Defamation Title 12, section 1441 and section 1442. (Okla.Stat.tit.12§1441 and 1442) and §21-781
- e. Education Amendments of 1972, (“Title IX”), 20 U.S.C.§§ 1681et seq.,violated
- f. Oklahoma Statutes § 70-24-100.4 School Safety and Bullying Prevention Act
- g. Negligence: §21-93 and § 25-6 and §23-13
- h. Improper suspension §24-101.3. Out-of-school suspensions–Right to appeal
- i. \*Civil rights conspiracy 18 U.S.C.§ Section 241( Section 241)
- j. 21 OK Stat § 21-421

***I allege the following:***

1. On the morning of September 7, 2022. Sadly, at no fault of TPD Officer as per. allegations setforth in no. 24 Cause of Action, above, and incorporated by reference as if setforth at length herein.But instead, Resource Officer Alexander followed up as a confidant and expeditiously notified Defendant 2, Dr. Woolridge and Defendant 3, Dean Arterberry directly about the bullying reports received by TPD officer from the Plaintiff on September 2, 2022. As a result, Defendant 2, Dr.

Woolridge and Defendant 3, Dean Arterberry, immediately enraged, collude and conspired with Resource Officer Alexander, in retaliation, together they determined to injure the Plaintiff any cost and by all means. Thereby, together they decided to make false claims of sexual misconduct using two students to say the Plaintiff sexually assaulted them while refusing to make mention of these allegations to the Plaintiff. As a result, Officer Alexander wrote two sexual assault reports. On September 8, 2022. Plaintiff returned to school @ 8:25am. AP Lazdins received the minor, Plaintiff out of his third hour Science class around 10:40a and escorted him to Defendant 3, Dean Arterberry's office with Defendant 2, Dr. Woolridge, principal with Campus Police J. W. present to review and sign Safety Plan documents from the September 6, 2022 Zoom meeting. Upon completion of signing the safety plan documents AP Lazdins accompanied minor, Plaintiff to the receptionist office rather than back to class. Plaintiff resided in the receptionist office confused and blind-sided by what was happening, eager to return to class, he began asking why he was just sitting in the office; but without reason AP Lazdins just simply prohibited him from returning. While this activity was happening, Defendant 3, Dr. Woolridge phoned the mother, Plaintiff around 10:30am stating she needed to come pick up the minor, Plaintiff right away due to him being suspended, not mentioning any required disciplinary responses and interventions. Immediately, the mother, Plaintiff drove frantically over to "BTW" very concerned, while deeply desiring to know the happenings. However, upon arrival Defendant 2, Dr. Woolridge, Defendant 3, Dean Arterberry, AP Myers and Camp Police Officer J. W greeted the mother, Plaintiff outside in front of "BTW" school entrance. The mother, Plaintiff jumped out of the car, very alarmed and recording asking what happened? What did my son do? without hesitation, Defendant 2, Dr. Woolridge,

with a mask on, asked the mother, Plaintiff did she call the police? The mother, Plaintiff replied, without hesitation, yes! last week, Friday when my son was being threatened with physical harm if he goes into the locker room.” Immediately, in fury, Defendant 2, Dr. Woolridge said “I’M DONE” and handed the mother, Plaintiff an envelope with a Suspension Notice inside along with a 2022- 2023 Student and Family Guide To Success HandBook. The mother, Plaintiff opened the envelope and read the suspension notice which stated the minor, Plaintiff violated district Policy 318 Sexual Harassment which constitutes sex discrimination under Title IX. The mother, Plaintiff screamed, No way! asking Defendant 2, Dr. Woolridge, principal “what did her minor, Plaintiff do to get such a cruel and excessive suspension of 150 days, to return the following year?” “What did he do? This is not my son” Defendant 2, Dr. Woolridge replied, “ I can not tell you”, adding, “there are two police report numbers on the envelope. The mother, Plaintiff again asked “what did my son do?” Defendant 2, Dr. Woolridge again stated, “I can’t tell you, he’s a minor, you have to find out from the police. It’s out of our hands, go to the police to find out.” Campus Police J. Williams, also directed the mother, Plaintiff to go downtown to the Police Department. The school can not say. It’s out of their hands. The mother, Plaintiff said, where is my son? Is he alright? where is he? Like clockwork, Officer Scott quietly walked the minor, Plaintiff to the front of “BTW” entrance doors. The minor, Plaintiff saw his mother outside, walked up to her asking, “Mommy why are you here? I have to go back to Science class” the mother, Plaintiff then said, “No, son, you have to come with me.” The minor said, “why mommy? I have to go back to class.” The mother, Plaintiff asked Defendant 2, Dr. Woolridge, does the minor, Plaintiff know what’s going on? Defendant 2, Dr. Woolridge said, “No!” the mother, Plaintiff told the minor, Plaintiff to get all his things. The minor, Plaintiff very confused

continually asking, " WHY Mommy?" "Why? " I have to get back to my Science class." The mother, Plaintiff then replied, "I'll tell you in the car." The mother, Plaintiff asked for all of the minor, Plaintiff personal things (football gear) along with the \$350 football fees paid. Defendant 2, Dr. Woolridge stated she had nothing to do with that. Football is not a part of the school. However, directed AP Myers and Officer Scott to escort the minor to the Fieldhouse locker room to retrieve all of his personal things. Unfortunately the helmet face shield, 2 IBELIEVE towels, and 2 IBELIEVE HEADBANDS were missing. valued at \$87. Defendant 6, Dr. Wallace deliberately failed to return personal property despite multiple requests.

**26. Cause of Action: Negligence: §21-93 and § 25-6 and §23-13**

**Civil Rights Conspiracy 18 U.S.C. § 241 (Section 241)**

**First, Fifth ,Sixth and Fourteenth Amendments of the U.S.Constitution (see 42 U.S.C. §1983) violated.**

**I alledge the following:**

The Plaintiffs drove to Police Department to find out what the minor had been accused of. However, no one would share any information because he was a minor. The Plaintiffs, very overwhelmed because absolutely NO ONE would or could share any information. Despite him being the mother, Plaintiff biological son. But for the failure of Defendant 2, Dr. Woolridge to exercise reasonable care, by not acting in accordance with district Policy 2619-R the minor, Plaintiff constitutional rights would not have been violated, nor would he have suffered in desperation, longing to have knowledge into the alleged sexual misconduct with an explanation of the underlying Facts. Not to mention, he would not have suffered an improper suspension on September 8, 2022. @ 10:50am by Defendant 2, Dr. Woolridge, due to her intentionally abandoning her obligation and

duty under the law ensuring the minor, Plaintiff exercised his "Due Process rights" prior to her abrupt suspension on an emergency basis, deliberately insubordinate thus breaching district P-2607, 2619 and 2619-R. Thereby, attempting again, to deceive and manipulate, taking unfair advantage, refusing to act in good faith, but in retaliation, misusing the legal procedure due to the factual allegations set forth in In all of the above factual allegations and are incorporated by reference as if set forth at length herein. By doing this, Defendant 2, Dr. Woolridge caused the Plaintiff to suffer the loss of attending his choice school, being that, "BTW" alone in Tulsa offers advance learning opportunity to obtain his International Baccalaureate (IB Diploma) a two-year comprehensive and rigorous pre-university curriculum. The minor, Plaintiff, an advance honor student would not have been robbed of his opportunity to be successful IB student with the chance to be granted advanced placement credit at the finest universities and colleges in the nation aimed at becoming a lawyer and a judge some day. But for failure of Defendant 2, Dr. Woolridge, principal and Defendant 3, Dean Arterberry, to exercise reasonable care, demonstrate prudence and restraint, the minor, Plaintiff constitutional rights would not have been violated thereby, causing him to needlessly suffer mentally, emotionally and socially as a result of being intentionally deprived of his right to be given an oral and/or written Notice describing in detail, and clarifying precisely with whom, how, when, where, and how often the minor, Plaintiff allegedly violated district Policy 318: Title IX Sexual Harassment according to Title IX Regulations with an opportunity to respond before being suspended for 150 days (a year) contrary to district policy on Thursday, September 8, 2022 @10:45am. On top of that, the minor, Plaintiff "Due Process" outlined in the Title IX Regulations REQUIRES compliance with the rules

setforth by U.S. Department of Education would not have been violated.

**27. Cause of Action: Negligence: §21-93 and § 25-6 and §23-13**

**I allege the following:**

But for the failure of Deborah Gist to exercise reasonable care, by addressing the Plaintiff unlawful suspension when the Plaintiff called her office multiple times, and included her in multiple emails seeking fairness. Due to no response, the Plaintiff delivered flyers to the school board meeting in an attempt to bring attention to the unfair and unjust treatment. The Plaintiff personally gave Dr. D. Gist a flyer, being hopeful she would respond in a professional manner in accordance to district policy, state and federal laws. Nonetheless, Dr. Gist sent her representative to ask the Plaintiff her name and number to follow up. Unfortunately, she never did. As a result, Plaintiff continued to suffer an unlawful suspension and robbed of his desired learning experience if she would have intervened. Dr. Gist, recused herself, passing the Plaintiff's contact information and flyer onto Defendant 6, Dr. Wallace. But for Dr. Gist, morally indifferent, failed to exercise reasonable care, the Plaintiff would not have been bullied with a threatening phone call from Defendant 6, Dr. Wallace asking if the Plaintiff had put out a flyer at the school board meeting? And the Plaintiff emphatically responded yes! FIX IT! saying, what you are doing is absolutely wrong. FIX IT! Asking, what did her minor, Plaintiff do to deserve this? Defendant 6, Dr. Wallace responded, "I can not say." The mother, Plaintiff then said, she was going to the media. Defendant 6, Dr. Wallace, using prohibited

retaliatory, intimidating, threatening, fear tactics stated, "If the MOTHER goes to the media regarding what he and TPS, Washington HS was doing to her MINOR, he, (TPS) would come after him, emphasizing the BIGNESS of their district and lawyers" stating the Plaintiff do not want to do that. Repeatedly stating, they would come after the minor, Plaintiff. IF the minor, Plaintiff would not have heard Dr. Wallace threaten to come after him, he would not have fallen suddenly to the floor, for the first-time ever, uncontrollable shaking, eyes rolling back/ forward in a daze, frothing at the mouth, turning jet black, stopped breathing, un-responsive for 20minutes right before the mother's eye, died on the floor in his room one day later around 11:30 am after hearing a professional school leader calling the mother, Plaintiff making an official threat, promising to come after her son, a minor, Plaintiff if she calls the media and tell them what they are doing to your son. An emergency 911 call would not have been made and the ambulance and police would not have rushed over. The MOTHER would not have been so overwhelmed and overcome with fear yet, full of faith in God, prayed and watched GOD bring her son back. The MINOR would not have gone to "CORE" emergency surrounded by a caring physician, loving nursing staff, and on-call staff being called in to conduct multiple brain tests confirming the miracle power of GOD. However, the physician strongly suggested following up with the MINOR's primary care physician. In doing so, the primary care physician would not have been stunned and in deep shock due to the MINOR great

medical history. Therefore, immediately requesting one of Tulsa's top pediatric

NEURO physicians to examine him. However when the NEURO physician examined the minor, Plaintiff, being uncertain of the minor's death. However, could not rule out, therefore prescribed the minor, Plaintiff Valtoco 10mg, and be monitored for seizures. AND, the minor, Plaintiff's primary physician would not have felt the need to refer him to mental health services due to concerns of possible stress. AND the Director of Outpatient Services, LCSW would not have had need to evaluate and treat him for such.

**28. Cause of Action: Negligence: §21-93 and § 25-6 and §23-13  
Civil Rights Conspiracy 18 U.S. Code, Section 241  
First, Fifth, Sixth and Fourteenth Amendments of the  
U.S. Constitution (see 42 U.S.C. §1983) violated.  
Defamation Title 12, section 1441 (Okla, Stat. tit.12 § 1441)  
Okla.Stat. tit.25, §§ 1101-1706 ( Intentional Discrimination)**

**I allege the following:**

But for the failure of Defendant 6, Dr. Wallace to exercise reasonable care by fulfilling his professional duties to serve as resource to the district, schools, parents, and students regarding student discipline. He consistently and consciously decided to not only address the Plaintiffs ongoing bullying concerns but also, in retaliation refrained from addressing the improper suspension according to district Policy: 2607, 2615, 2619 and 2619-R. In addition to Federal Title IX Regulations. The minor, Plaintiff just would not have suffered such an humiliating, embarrassing and unlawful suspension. But for the malicious negligence of Defendant 6, Dr. Wallace, his intentional failure to exercise reasonable care by adhering to his required

knowledge of Federal, State, Laws, District policies and procedures. Defendant 2, Dr. Woolridge and Defendant 3, Dean Arterberry would have been prohibited from defaming the MINOR's name and character with false and fictitious allegations of violating district Policy 318 Title IX Sexual Harassment. But rather joined the Civil Rights Conspiracy falsely accusing Plaintiff of violating Title IX Sexual harassment along with Defendant 2, Dr. Woolridge and Dean Arterberry. Hence, the minor, Plaintiff would not have suffered retaliation, being falsely accused, name defamed, due process rights violated, and abruptly suspended from his choice high school and robbed of his legal right of full access to advanced learning, scholarships and athletic opportunities. Defendant 6, Dr. Wallace failure to act consistently in accordance Federal, State, and District laws, policies, procedures, and best practices regarding student discipline caused the Plaintiff to suffered an unjust and unlawful suspension without his "due process" in education rights conducted and completed. AND, MOTHER, Plaintiff not privileged to any information surrounding the alleged Title IX Sexual Harrassment policy 318. Thus, violating the Plaintiffs Six Amendments right to an impartial hearing, knowledge of accusers, AND the nature of the charges, and to see and know the evidence against him. Nonetheless, in defiance, Defendant 6, Dr. Wallace denied the Plaintiff equal access to "BTW" education program and activities permanently, never allowed to return, inconsistent to district Policy 2619-R, Federal and state laws. But for the intentional negligence

of Defendant 6, Dr. Wallace, the minor, Plaintiff would not have been threaten, intimidated, retaliated against, and betrayed by people who suppose to care for minor as a guardian ( loco parentis). However, Defendant 6, Dr. Wallace took great pleasure in bullying the mother, Plaintiff by abusing his power to twist, turn and manipulate the district policies and procedures with the intent to protect and cover up Defendant 2, Dr. Woolridge and Defendant 3, Dean Arterberry reckless conduct in addressing the minor, Plaintiff bullying concerns as per. District policy, falsely accusing him and then improperly suspending him in retaliation. Intentionally deceiving and depriving the Plaintiff of his constitutional rights under the color of law. In addition to, directing staff members to do the same inconsistent with district policies and procedures. Defendant 6, Dr. Wallace worked diligently to prevent the Plaintiffs from being heard thus violating their Title VI of the Civil Rights Act of 1964 (Title VI) and Title IX of the Education Amendments of 1972 (Title IX) and prevailed. The mother, Plaintiff would not have experienced vicarious trauma as a result of witnessing and experiencing the life- altering effects of her minor, Plaintiff being victimize, traumatized, defamed, and deprived of his protected rights and privileges secured by the Constitution for simply exercising his First Amendment right to report bullying due to BTW's omission to heed to district bullying policies and oklahoma's anti bullying laws and policies and conducting a flawed investigation that brought more harm, thus creating a hostile environment causes the minor, Plaintiff to feel fearful of life being in danger and in desperation called the police

seeking safety and protection. Despite Title VI of the Civil Rights Act of 1964 (Title VI) and Title IX of the Education Amendments of 1972 (Title IX) prohibiting retaliation against individuals who assert their rights under these laws in programs or activities receiving federal financial assistance. Despite TPS being state actors. Everytime, the Plaintiff exercised their protected rights to report bullying and the unlawful suspension under the First and Fourteenth amendment to the constitution to the powers that be, Defendant 6, Dr. Wallace went harder, abusing his power, with an iron hand, making every effort to discredit the mother and minor, Plaintiff with the intent to stop and block them by fabricating erroneous lies thus preventing the Plaintiff from being heard, with the intent to keep the MINOR out of Washington HS, having full access to his choice school for advance learning, with opportunities to obtain academic and sports scholarships.

**29. Cause of Action: First, Fifth ,Sixth and Fourteenth Amendments of the U.S.Constitution (see 42 U.S.C. §1983) violated.  
Negligence: §21-93 and § 25-6 and §23-13  
Civil Rights Conspiracy 18 U.S. Code, Section 241  
Okla.Stat. tit.25, §§ 1101-1706 ( Intentional Discrimination)**

**I allege the following:**

Due to Defendant 6, Dr. Wallace's non-compliance to district policies and procedures federal, state, and local laws. Plaintiff, with the hope of being treated fairly according to district suspension policies with the permission to return to school. However, when turning to Defendant 7, Michelle Sigfried, she too, failed to exercise

reasonable care, despite truthfully and thoroughly investigating, finding the minor, Plaintiff had no behavior record, was not guilty of violating district Policy 318 Title IX Sexual Harassment or any other school rules and regulations with full knowledge that the term of suspension was not reasonable nor in compliance with district policy. For this reason, Defendant 7, Michelle Sigfield went on an extensive witch hunt seeking to devour the minor, Plaintiff, searching for anything to justify the vengeful acts of Defendant 2, Dr. Woolridge, principal. In doing so, Defendant 7, Michelle Sigfield willingly chose not to adhere to district policies nor demonstrate her acquired Title IX training that was to be implemented on or by August 14, 2020. Because of this, the minor, Plaintiff suffered unfair treatment without equal application and protection under the laws. By this, she chose to aid and abet in the perpetuated sham; the civil rights conspiracy, and in shady way, also falsely accused the minor, Plaintiff of violating District Policy 318 Title IX Sexual Harassment with Defendant 2, Dr. Woolridge, Defendant 3, Dean Arterberry and Defendant 6, Dr. Wallace in retaliation. Disregarding the Plaintiff's civil rights and violating them. Working in concert with Defendant 2, Dr. Woolridge, fulfilling her desires to have the minor, Plaintiff stripped of his right to attend and have full access to all sports, academic and social activities at his preferred place of learning. Defendant 7, Michelle Sigfield, with a conscious disregard, violated state Title 70. Schools. §70-24-101.3. Out-of-School Suspension. In addition to district Policy and Procedure # 2619-R. On top of that, with a reckless disregard of professional duties she intentionally failed to follow Title IX regulations, which ensures the Plaintiffs rights are respected and protected. In like manner,

demonstrated prohibited retaliation discrimination. But for the failure of Defendant 7, Michelle Sigfield to exercise her professional and legal duty of care, caused the minor, Plaintiff to continue to suffer an improper, unjust and illegal expulsion and barred from "BTW" at the direction of Defendant 2, Dr. Woolridge and 6, Dr. Wallace. Because of this staffing collusion, the minor, Plaintiff was intentionally denied his student rights coupled with his due process rights under Title IX just to satisfy the desired results of Defendant 2, Dr. Woolridge to have the minor, Plaintiff permanently removed in retaliation contrary to district policy and the minor, Plaintiff civil rights. Because of this cruel, unusual and excessive punishment, the minor, Plaintiff was robbed of enjoying full access and equal opportunities to participate in every aspect of his education free from violence, retaliation, harassment and intimidation. After finding nothing to suffice their unlawful actions. Defendant 7, Michelle Sigfield, chose deceitful manipulation with the intent to deceive the mother, Plaintiff, in to believing her minor, Plaintiff had sexual misconduct issues and was a danger to the school and strongly suggesting he was the problem and would best benefit from mental health services. Thereby, using blame shifting tactics that protect bullies, accuse, punish and label the victim as mentally-ill without one visit with minor, Plaintiff or referring school counseling services to confirm.

**30. Cause of Action: First, Fifth, Sixth and Fourteenth Amendments of the U.S. Constitution (see 42 U.S.C. §1983) violated.  
Negligence: §21-93 and § 25-6 and §23-13  
Okla.Stat. tit.25, §§ 1101-1706 ( Intentional Discrimination)  
"Due Process" rights violated outlined in the Title IX  
Grievance Procedures pursuant to Title IX Regulations**

adopted by the U.S Department of Education(USDOE),  
effective August 14, 2020.

I allege the following:

As a result of Defendant 7, Michelle Sigfied, failure to act in accordance with district policies and Title IX Regulations. The Plaintiff then reached out to Defendant 4, Eva Vindas, Title IX Coordinator due to never being informed of any Sexual harassment complaints or allegations received. No one at TPS directed the Plaintiffs to speak to Eva Vindas, Title IX. However, after careful research outside of TPS the Plaintiff was inform to speak with the Title IX Coordinator regarding the said allegations and suspension. Once again, under the direction of Defendant 6, Dr. Wallace , Eva Vindas refused to speak with Plaintiff in an effort to preserve the minor, Plaintiff access to school without unreasonably burdening him contrary to Title IX regulations. But for the failure of Eva Vindas, Title IX Coordinator to exercise reasonable care, the minor, Plaintiff would not have been fictiously and falsely accused of Sexual Harrassment violation by Defendant 2, Dr. Woolridge, principal and Defendant 3, Dean Arterberry. At minum, after her investigation found the facts, as alleged did not violate one of the definitions of sexual Harassment (Severe, Pervasive, and Objectively Offensive) then the complaint should have been dismissed –at least from a sexual harassment perspective.If alleged conduct were not covered under Title IX, address under student code of conduct. In additon to, being treated unequally and very unfair; and longing for his

Due Process Protections under Title IX Regulations to be observed. The MINOR would not have been deprived of knowledge of complaints, the complaintants, a live hearing, a cross-examination supportive measures, etc...And, most importantly, an OUTCOME NOTIFICATION.

**31. Cause of Action: First, Fifth, Sixth and Fourteenth Amendments of the U.S. Constitution (see 42 U.S.C. §1983) violated.  
Negligence: §21-93 and § 25-6 and §23-13  
Civil Rights Conspiracy 18 U.S. Code, Section 241  
Defamation Title 12, section 1441 (Okla, Stat. tit.12 § 1441)  
“Due Process” rights violated outlined in the Title IX  
Grievance Procedures pursuant to Title IX Regulations  
adopted by the U.S Department of Education(USDOE),  
effective August 14, 2020.  
Okla.Stat. tit.25, §§ 1101-1706 ( Intentional Discrimination)**

**I allege the following:**

Despite all of the Defendant's failure to exercise reasonable care, the Plaintiffs continued to seek fairness by requesting a suspension appeal. The appeal was granted for October 7, 2022 @ 11:00a with Defendant 5, Stephanie Andrews by Renee Weygrant, an assistant to Defendant 6, Dr. Wallace. A suspension packet, nor the opportunity to choose two teachers to join the appeal was not not allowed inconsistent with district policies. In utter dismay, Defendant 5, Stephanie Andrews purposely deceived the Plaintiffs stating she did not have any information to share. She only knew he had no behavior record. Also stating there's nothing wrong with having sexual harassment on your record it won't prohibit him from

enrolling into college, don't worry about it. The suspension appeal was never conducted nor completed in the light of Plaintiff's request. Despite Defendant 5, Stephanie Andrews stating she had no information to review and share with the Plaintiffs she mailed a letter dated October 10, 2022 stating she had completed her Suspension Review Hearing and reached her suspension decision and modified the suspension to Code 315 Title IX Discriminatory Harassment. How so, when according to the Behavior Response Plan Booklet states the suspension decision is to be reviewed by the Student Suspension Review Committee (SSRC) which is established by the principal and consists of at least four building teachers and/or administrators. This is opposite of district school policy and procedures. She also unlawfully sentenced him to an Alternative School without first discussing it with the mother, Plaintiff. But for the failure Defendant 5, Stephanie Andrews to exercise reasonable care, the Plaintiff would suffered his name being defamed again by falsely accusing the Plaintiff of violating 315 Discriminatory Harassment in a letter October 10, 2022. Renee Weygandt sent an email on October 17, 2022 detailing Defendant 5, Stephanie Andrews decision. As a result of this, The Plaintiffs were not Only deprived of due process educational rights for Title IX Sexual Harrassment allegations but also deprived of Title IX Discriminatory Harassment due process rights as well. Again, contrary to district policy. While Defendant 6, Dr. Wallace, by design, permanently banned him from "BTW" contrary to district policy. Also continues to prohibit the minor, Plaintiff from attending school in a different district, stating the minor,

Plaintiff is still suspended and has to attend Tracie Academy. Again, against district policy. Defendant has intentionally tarnished the minor, Plaintiff High School transcript and continues to block him from returning to BTW along with enrolling and attending a new school in a different district with the intent to destroy the minor, Plaintiff academic success and future career all in the name of retaliation. He also refused to return the Plaintiff personal things, such as: 1. Football helmet face shield/visor, 2. Ibelive headband 3. and a I Believe towel for a total of \$87. 4. And a remaining refund balance of \$200. Officer Stovall on 9/13/2022 returned the Plaintiff a partial football refund of \$150 in the form of a check along with the Plaintiff back support.

Defendant's actions violated G.G., III's rights under Title IX, which prohibits discrimination on the basis of sex in education programs or activities receiving federal financial assistance. See *Davis v. Monroe County Board of Education*, 526 U.S. 629 (1999) (<https://supreme.justia.com/cases/federal/us/526/629/>).

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

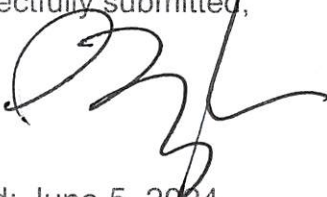
- A. Declare that Defendant's actions violated G.G., III's rights under Title IX;
- B. Enjoin Defendant from further violating G.G., III's rights under Title IX; Injunction restraining Defendant from further violations and to take necessary action To stop the bleeding and restore and make whole the Plaintiff. Redress the damage caused by the initial violation.
- C. Award compensatory damages to G.G., III for his loss of free public education the past two years, pain and suffering; and mental and emotional abuse;
- D. Declaratory Judgment that Defendant violated Plaintiff's rights as per Title IX, U.S. Constitution's First, Fifth, Sixth and Fourteenth Amendments rights, and Oklahoma

Education Act. In addition to all such violations.

E. Compensation for all damages entitled to caused by such violations.

E. Grant such other and further relief as this Court deems just, equitable and proper.

Respectfully submitted,

 6/5/24.

Dated: June 5, 2024

Paulette Taylor Obo G.G.III a minor  
7521 S.Olympia  
West#1010  
Tulsa, Oklahoma 74132  
United States  
918-902-5873  
1georgegibbs@gmail.com

Notary Carissa Chatham  
Com # 2204173  
Exp 10/20/26

CARESSA CHATHAM  
NOTARY PUBLIC - STATE OF OKLAHOMA  
MY COMMISSION EXPIRES OCT. 20, 2026  
COMMISSION # 22014173



CONALDSON  
1423 TERRACE DR  
TULSA, OK 74104-8993  
(800)278-8777

09/05/2023

06:33 AM

Product	Cty	Unit	Price
Priority Mail®	1		\$9.65
St Flat Rate Box			
Tulsa, OK 74114			
Post Rate			
Expected Delivery Date			
Wed 09/05/2023			
Tracking #:			
9508 5148 2612 3248 5165 87			\$0.00
Insurance			
Up to \$100.00 included			\$9.65
Total			\$9.65
Grand Total			\$9.65
Cash			\$10.00
Change			\$0.35

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Thank you for your business.

Tell us about your experience.  
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or scan this code with your mobile device.



or call 1-800-410-7420

LFN: 398341-0004  
Receipt #: 840-571003-3-2-4310625-2  
Clark: 4

Exhibit I

U.S. Postal Service  
CERTIFIED MAIL® RECEIPT  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Certified Mail Fee

Extra Services & Fees (check or add fee appropriate)	
Return Receipt (hardcopy)	
Return Receipt (electronic)	
Certified Mail Restricted Delivery	
Adult Signature Required	
Adult Signature Restricted Delivery	

Postage

Total Postage and Fees

Sent To

Street and Apt. No., PO Box No.

City, State, ZIP+4®

PS Form 3800, January 2023 PSN 7530-02-000-9017 See Reverse

Tracking #:

Return Receipt

Tracking #:

Total

Grand Total

Debit Card Permit

Card Number MasterCard

Account # XXXXXXXXXX4989

Approval #

Transaction #: 515

Receipt # 024317

Debit Card Purchase \$9.97

Card Swiped

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All sales final on stamps and postage.  
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or scan this code with your mobile device.




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LFN: 398341-0004  
Receipt #: 840-571003-3-2-4310659-2  
Clark: 4

CARESSA CHATHAM  
NOTARY PUBLIC - STATE OF OKLAHOMA  
MY COMMISSION EXPIRES OCT. 20, 2026  
COMMISSION # 22014173

Notary Caressa Chatham  
Com # 22014173  
Exp 10/20/26

655.24

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	<p>A. Signature <input checked="" type="checkbox"/> <i>Sarah Bozone</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Sarah Bozone</i> C. Date of Delivery <i>9.5.23</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No <i>Governmental Tort Claims</i> <i>9 in total</i></p>																
<p>1. Article Addressed to: <i>Tulsa Public Sch.</i> <i>Sarah Bozone, Clerk</i> <i>3027 S. New Haven Ave</i> <i>Tulsa OK 74114</i></p>  <p>9590 9402 8027 2305 1108 36</p>	<p>3. Service Type</p> <table border="0"><tr><td><input type="checkbox"/> Adult Signature</td><td><input type="checkbox"/> Priority Mail Express®</td></tr><tr><td><input type="checkbox"/> Adult Signature Restricted Delivery</td><td><input type="checkbox"/> Registered Mail™</td></tr><tr><td><input type="checkbox"/> Certified Mail®</td><td><input type="checkbox"/> Registered Mail Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Certified Mail Restricted Delivery</td><td><input type="checkbox"/> Signature Confirmation™</td></tr><tr><td><input type="checkbox"/> Collect on Delivery</td><td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td><td></td></tr><tr><td><input type="checkbox"/> Insured Mail</td><td></td></tr><tr><td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td><td></td></tr></table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
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<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
<p>2. Article Number (Transfer from service label)</p>																	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

*P22 6.5.24.*

*Exhibit 2*

**Attention:**

Tulsa Public School Governing Board

**Sarah Bozone, Board Clerk**3027 S. <sup>Haven</sup> Haven Avenue, Tulsa, OK 74114

bozonsa@tulsaschools.org

Enclosed: Nine Governmental Tort Claims

Received by: Mekala Corrigan, deputy clerk of board  
Date: 9.7.23

Delivered by: P. Zfh 9.7.23

DZ 6-5-24  
Exhibit 3

**From:** Weygandt, Renee  
**Sent:** Monday, October 17, 2022 9:23 AM  
**To:** paulettet858@gmail.com  
**Subject:** George Gibbs

Ms. Taylor,

Per our conversation on Tuesday October 11, 2022, the following was discussed:

1. George's original suspension was for 150 days starting on 9/8/22
2. The Ban Appeal with Stephanie Andrews was on 10/7/22 at 10:30
3. The Suspension Appeal with Stephanie Andrews was on 10/7/22 at 11:00
4. The Suspension was modified to Code 315 Discriminator Harassment and reduced to 25 days of Suspension and Enroll at TRAICE Academy on 10/13/22.
5. TRAICE Academy is an 18 week program, but at 9 weeks there is an evaluation and if George meets 85 percent of the Criteria George will be able to enroll at his home school which is Hale HS.
6. The Ban was upheld.
7. TPS will not release any of George's records until the following has been turned in at the Enrollment Center to Dr. Wallace's office:
  8. BTW Student ID
  9. Chrome Book and Charger

The Suspension Appeal decision letter will be following this email.

Renee Weygandt | Discipline Support Assistant  
Tulsa Public Schools, Student and Family Support Services Department  
2819 S New Haven Ave., Room 327, Tulsa, OK 74114Zip  
T: 918-746-6457  
C: 918-\*\*\*-\*\*\*\*  
[weygare@tulsaschools.org](mailto:weygare@tulsaschools.org)

Notary Carissa Chatham  
Comm 22014173

Exhibit 4

CARESSA CHATHAM  
NOTARY PUBLIC - STATE OF OKLAHOMA  
MY COMMISSION EXPIRES OCT. 20, 2026  
COMMISSION # 22014173

#### APPEALS OF OUT OF SCHOOL SUSPENSIONS

Students who have been suspended out of school have a right to appeal their suspension by requesting a hearing either before the Suspension Review Committee (SRC), the Superintendent or designee or a hearing officer as may be appropriate. While a hearing is pending, the suspension will be held in abeyance allowing the student to have the right to attend school under such in-school intervention restrictions as the principal deems proper. However, participation in any extra-curricular activity is prohibited. A student may be prohibited from attending school if, in the judgment of the principal, the conduct for which the student was suspended reasonably indicates continued attendance by the student would (1) be dangerous to other students, staff, or school property, and/or (2) interfere with the educational process at school.

#### ACCORDING TO STATE LAW, SUCH APPEALS ARE LIMITED TO ONE OR BOTH OF THE FOLLOWING:

- \*Is the student guilty of a violation of the school rules and regulations?
- \*Is the term of the suspension reasonable and in compliance with the Behavior Response Plan?

#### SUSPENSION REVIEW COMMITTEES

Suspension Review Committees (SRC) exist at each school and are created through the following process:

\*A list is made up of professional staff who volunteer at the beginning of the school year to serve on the SRC.

\*Volunteers must attend district training at the beginning of the school year.

\*The SRC for each hearing will be comprised of:

Two (2) volunteers of the student's and/or parent/guardian's choice picked from the list of volunteers (the parent/guardian may submit five (5) names in order of preference) and:

One (1) volunteer appointed by the principal and

One (1) volunteer, appointed by the principal, who will serve as a non-voting chairperson and facilitator of the discussion.

\*Volunteers involved in the incident cannot serve on the SRC.

\*Volunteers have the right to refuse to serve for any particular case.

#### Note:

When an incident occurs that involves more than one student and multiple suspensions, the same committee members that were appointed by the principal, when available, will hear all appeals associated with the incident.

The SRC hearing will be scheduled with consideration given to the hours of working parents whenever possible. The student and parents/guardians and the principal or designee who issued the suspension shall be present at the hearing, but shall not remain during the deliberation of the committee or participate in the decision. The student and parents/guardians may choose to have one resource person assist and advise, but that person will not be allowed to address the committee and must also leave during the committee's deliberation (interpreters are acceptable).

The SRC will meet as soon as possible after receipt of the appeal request and the principal will notify the student's parents/guardians of the time and place of the hearing not less than 24 hours in advance of the hearing.

The SRC is charged to determine the guilt or innocence of the student and/or the reasonableness of the term of suspension, and must decide one of the following actions: to sustain (the suspension remains in force as enacted), to rescind (the suspension becomes null and void) or to modify (the suspension may be changed to reflect any number of days suspended between the minimum and the maximum days allowed within the offense category specified; the SRC may not change the category).

#### IF THE OUT-OF-SCHOOL SUSPENSION IS FOR TEN (10) DAYS OR LESS:

Within five (5) school days from the date of suspension, the student's parent/guardian may request, in writing, a hearing by the building SRC. THE DECISION OF THE SRC WILL BE FINAL AND NONAPPEALABLE.

#### IF THE OUT-OF-SCHOOL SUSPENSION IS FOR MORE THAN TEN (10) DAYS:

Within five (5) school days from the date of suspension, the student's parent/guardian may request, in writing, a hearing of the building SRC.

\*If the student's parent/guardian is not satisfied with the SRC's decision, a request for a further hearing by the Superintendent or designee may be made by written notice to the school principal within five (5) school days after the parent/guardian is notified of the SRC's decision.

\*The principal may also appeal the SRC's decision to the Superintendent or designee within five (5) school days after the SRC's decision.

\*The Superintendent or designee will schedule a hearing as soon as possible, notify the parent/guardian of the time and place of the hearing at least 24 hours prior to the hearing, and notify the parent/guardian that they and the student have a right to be present at the hearing.

\*The Superintendent or designee will review the facts, determine the guilt or innocence of the student, the reasonableness of the term of the suspension, and decide to sustain, rescind, or modify the out-of-school suspension (including change of category), or change the out-of-school suspension to an alternative school placement. The Superintendent or designee will notify the student's parent/guardian of the decision in writing.

\*If the decision of the Superintendent or designee is to sustain or modify the out-of-school suspension, the parent/guardian may appeal that decision to a hearing officer except that a decision to change the out-of-school suspension to an alternative school placement is not appealable.

If the parents/student are not satisfied with the decision of the Superintendent or designee, the parents/student may further appeal to a Hearing Officer.

\*A written request from the student's parent/guardian must be made to the Superintendent within five (5) school days after the parent/guardian has been notified of the decision of the Superintendent or designee.

\*If no appeal is received within the five (5) days the decision of the Superintendent or designee is final.

\*The hearing officer will set the time and place of the hearing.

\*The parent/guardian will be notified in writing of the time and place of the hearing at least 24 hours prior to the hearing. The student and parent/guardian will have a right to be present in person at the hearing. The hearing officer will determine the guilt or innocence of the student and the reasonableness of the term of the suspension as determined by the relevant category and action level.

THE DECISION OF THE HEARING OFFICER IS FINAL AND MAY NOT BE APPEALED.

I was told there was no hearing officer and could not go to school board.

is it a DRC or SRC  
either one - we weren't allowed

Notary Carissa Chatham

Comm # 220141173

Exhibit 5

6.5.24

CARESSA CHATHAM  
NOTARY PUBLIC - STATE OF OKLAHOMA  
MY COMMISSION EXPIRES OCT. 20, 2026  
COMMISSION # 220141173

## Tulsa Public Schools - Notice of Out-of-School Suspension

September 8, 2022

WASHINGTON HIGH SCHOOL  
1514 E. Zion St.  
TULSA, OK 74106

To the parents/guardians of GEORGE GIBBS:

Safety, security and student success are priorities for Tulsa Public Schools and WASHINGTON HIGH SCHOOL. Student conduct is a critical factor in maintaining a safe learning environment for students.

GEORGE was referred to the office for violation of Tulsa Public Schools' Target Behavior: 318 TITLE IX SEXUAL HARASSMENT.  
The violation occurred on 09/07/2022. Various dates

GEORGE chose to disregard this Target Behavior which resulted in the following consequence:  
SUSPENDED FROM SCH.

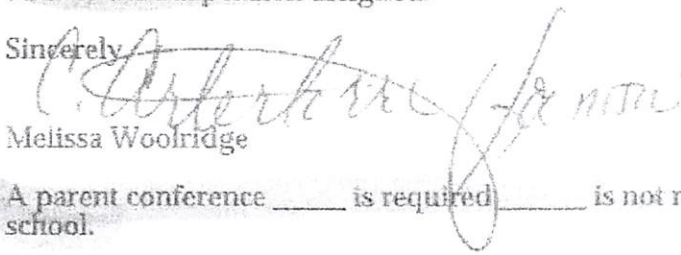
The Out-of-School Suspension will be for a period of 150 days, to begin on 09/08/2022 and end on 05/25/2023.

GEORGE may return to school on 08/22/2023. For suspensions that extend into the next school year, you will need to bring proof of residency with you when your student returns to school. Students suspended out of school will have an excused absence recorded on the attendance records. Student who do not return on the assigned date will have an unexcused absence recorded on the attendance records; please make sure that your student returns to school on the assigned date.

Parents and students are responsible for any missed course work during the suspension. The return date may be adjusted due to cancellation of school.

Please feel free to call 918-925-1000 if you have any questions about this Discipline Referral and/or the Suspension assigned.

Sincerely,

  
Melissa Woolridge

A parent conference \_\_\_\_\_ is required \_\_\_\_\_ is not required before the student may return to school.

NOTE: THE PRESENCE OF A SUSPENDED STUDENT ON ANY PUBLIC SCHOOL CAMPUS IS PROHIBITED.

pending DRC decision - you will be notified of appeal rights and process for appeal by DRC office.

Notary Carissa Chatham  
Comm # 22014173

EXP 10/20/26

Exhibit 6

CARESSA CHATHAM  
NOTARY PUBLIC - STATE OF OKLAHOMA  
MY COMMISSION EXPIRES OCT. 20, 2026  
COMMISSION # 22014173

**CARESSA CHATHAM**  
**NOTARY PUBLIC STATE OF OKLAHOMA**  
**MY COMMISSION EXPIRES OCT 20 2026**  
**COMMISSION # 22014173**

PATHWAYS TO OPPORTUNITY

For Level 300 infractions, interventions used along with disciplinary responses and can range from in-school discipline to long-term suspensions. Interventions applied in any case will depend on specific circumstances. Students with chronic level 300 infractions may be subject to level 400 interventions.

**PARENT/GUARDIAN CONFERENCE IS REQUIRED FOR ALL 300 LEVEL INFRACTIONS**

Level 300	Range of disciplinary responses and interventions
300: Fighting	<ul style="list-style-type: none"> <li>• Student conference</li> <li>• Student/teacher conference</li> <li>• Parent/guardian conference required</li> <li>• Team conference</li> <li>• Restorative conference</li> <li>• In school disciplinary action</li> <li>• Student required to complete Palmer Assessment (age 12 and over)</li> <li>• Repeated infraction may lead to initiation of Project ACCEPT referral</li> <li>• Long term suspension (not to exceed 45 days) based on totality of the circumstances and repetition of the behavior</li> <li>• Student Success Plan and/or Behavior Intervention Plan</li> <li>• Short term suspension</li> </ul> <p><b>Supports for students transitioning from suspension:</b></p> <ul style="list-style-type: none"> <li>• Schools are expected to provide support services to student returning from suspension to maximize their ability to meet social and academic standards within the community</li> <li>• Support services may include any of the range of interventions or a combination of services as best meets the need of the individual student</li> <li>• Upon re-entry from suspension, schools may implement Student Success Plans, Child Study Team interventions and Parent Communication Plans.</li> </ul> <p>Project ACCEPT (Alternative, Counseling, Coaching, Educator and Parent Professional Training) students are placed based on recommendation from the school site and review by Director of Student Advocacy. Program components are positive behavior, academic instruction,</p>
301: Possession of mace, chemical agents or similar materials or devices; <b>Immediate Campus Police notification required</b>	
302: Disorderly conduct	
303: Forgery or falsification of information	
304: Falsely reporting a crime; <b>Immediate Campus Police notification required</b>	
305: Verbal abuse of staff	
306: Abusive behavior toward school personnel. Staff should not block egress unless to protect the health and safety of others or to protect property. Should evidence indicate staff inciting the response, counseling will be the extent of the consequence. <b>Immediate Campus Police notification required</b>	
307: Trespassing (including during suspension) <b>Immediate Campus Police notification required</b>	
308: Failure to permit a lawful search or inspection by a school official (SB Policy 2602 and 2602R) <b>Immediate Campus Police notification required</b>	
310: Theft or receipt of stolen property <b>Immediate Campus Police notification required</b>	
311: Breaking and entering/vandalism (\$500+) <b>Immediate Campus Police notification required</b>	
312: Grand larceny (Theft >\$550) <b>Immediate Campus Police notification required</b>	
313: Use, possession of alcohol, drugs or drug paraphernalia; or under the influence of alcohol and or drugs <b>Immediate Campus Police notification required</b> School will provide referral for screening and counseling	
314: Assault	
315: Discriminatory harassment; contact Title IX Coordinator; documented investigation required	<p>Project ACCEPT (Alternative, Counseling, Coaching, Educator and Parent Professional Training) students are placed based on recommendation from the school site and review by Director of Student Advocacy. Program components are positive behavior, academic instruction,</p> <p><i>[Handwritten signature and date 6-5-24]</i></p>
316: Misconduct based on sex or gender; contact Title IX Coordinator; documented investigation required	
317: Consensual sexual misconduct	
318: Title IX sexual harassment; contact Title IX Coordinator; documented investigation required	

Why was I not ever notified?  
 Why Title IX Coord. Will not share information with me? May we be involved in the process? Do we have a say in this? Exhibit



TULSA PUBLIC SCHOOLS

EQUITY CHARACTER EXCELLENCE TEAM JOY

October 10, 2022

Paulette Taylor  
555 S. Lewis Ave. Apt. B304  
Tulsa, OK 74104

Dear Ms. Taylor:

Re: Suspension Review of Suspension of George Gibbs, 6/2/2008 from Booker T. Washington.

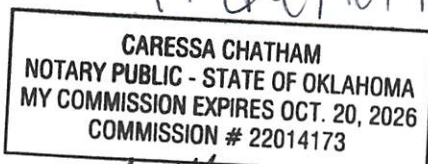
I have completed my review of George's suspension from Booker T. Washington High School. As a result of my review, I have decided to modify the suspension. George will be given the opportunity to continue school at our Alternative Suspension Program, TRAICE Academy, that will provide continued academic work and support. Ms. Renee Weygandt will contact you to discuss enrollment. Should you wish to appeal this decision, please provide written notice of your intention to appeal to the Clerk of the Board, Ms. Sarah Bozone, within 5 days of the decision.

Sincerely,

Stephanie Andrews

Executive Director of Student and Family Support Services

How can you modify without an appeal  
What are you modifying? sexual harassment  
it did not happen Ms. Andrews.

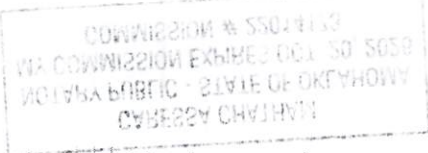


Caressa Chatham

3027 SOUTH NEW HAVEN AVENUE | TULSA, OKLAHOMA 74114

Notary 6-524  
EXP 10/20/26  
22014173

6-524  
Exhibit 8



Thanks so much,

**Attention:**

Tulsa Public School Governing Board

**Sarah Bozone, Board Clerk**3027 S. <sup>Haven</sup> Haven Avenue, Tulsa, OK 74114

bozonsa@tulsaschools.org

Enclosed: Nine Governmental Tort Claims

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3.

Print your name and address on the reverse so that we can return the card to you.

Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Tulsa Public Sch.  
Sarah Bozone, Clerk  
3027 S. New Haven Ave.  
Tulsa OK 74114

9590 9402 8027 2305 1108 36

Article Number (Transfer from service label)

Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Sarah Bozone ☐ Agent ☐ Addressee

B. Received by (Printed Name)

Sarah Bozone 9.5.23

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ NoGovernmental Tort Claims  
9 in total

3. Service Type

- ☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Received by:

Mekala Corrigan, deputy clerk of board

Date:

9.7.23Witnessed by: P. Zfh 9.7.23PAZ 6-5-24Notary Carissa Chatham  
Com # 2201473  
EXP 10/20/26

CARESSA CHATHAM  
 NOTARY PUBLIC - STATE OF OKLAHOMA  
 MY COMMISSION EXPIRES OCT. 20, 2026  
 COMMISSION # 22014173

Exhibit A